

Comments on proposed changes to Building Energy Efficiency Code, **High Performance Relocatable Classrooms** (Modular Classrooms)

Comments herein are from Scott Alexander, Mobile Modular, salexander@mgrc.com
Emailed to Bill Pennington, Bryan Alcorn, and Elaine Hebert, California Energy Commission,
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Dear Mr. Pennington,

We met at the CEC sponsored meeting on 9/27/02. I had promised to get back with you on some of the product life expectancy issues we had concern with. As a reminder my firm (Mobile Modular) and Williams Scotsman (who also attended) are two of the largest purchasers of modular classrooms in the state. Our business is to purchase and then lease to districts DSA approved classrooms, (we also sell classrooms but to a lesser degree). As a result we have large lease fleets and a support staff that maintain our product. Further, we regularly interact with school district maintenance departments.

With the above said, our concerns are specific to the estimated useful life for; dual pane windows, electronic ballasts and "Cool Roofs."

On dual pane windows our Service Departments are reporting back that a 6-8 year life is more reasonable. Electronic ballasts have a similar life expectancy. We have little experience with the "Cool Roof" product. On standard galvanized standing seam roofs we have experienced lives of 10 to 25 years based upon location. We believe a reasonable average would be 15 years. The coating may add to this life however, we have not seen any empirical data to support this. Further, the coating may present other difficulties...

Many commercial buildings that use a standing seam roof have a significant slope and therefore rely less on sealants. The roof on a DSA portable is relatively flat. Our experience is that the sealants used on a standing seam roof have a greater life adhering to a cleaned galvanized surface as opposed to any sort of finished surface. Thus, a painted or "Kynar" roof may create more leaks on the low slope roof design of a DSA portable. Leaks will create a plethora of other problems.

One of the discussion points at our meeting a few weeks ago was the diminished effectiveness of these "white roofs" when they are dirty. We suspect that the Cool Roof suppliers performed all testing under ideal conditions. Further, we checked with our service personnel to see what their experience was when inspecting a typical roof. It is very common to find a dirty roof. With that said, we feel the values placed on a Cool Roof may be suspect.

Sincerely,

Scott Alexander
Director of Governmental and Regulatory Affairs

CC: Bob Hansen Vice President Williams Scotsman
Leo Rainer Davis Energy Group
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